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1 **Filing** 2 Review 3 Confirmation

Proceeding:	03-123
Confirmation #:	20180509247305531
Submitted:	May 9, 2018 1:22:59 PM
Status:	RECEIVED
Name(s) of Filer(s)	Melissa M. Mash, Esq./Hawaii Public Utilities Commission
Law Firm(s)	
Attorney/Author Name(s)	Delmond J.H. Won
Primary Contact Email	Melissa.M.Mash@hawaii.gov
Type of Filing	LETTER
File Number	
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Address of	Filer
Address	465 S. King Street, #103, Honolulu, HI, 96813
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Federal Communications Commission
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Videophone: 1-844-432-2275
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DAVID Y. IGE
GOVERNOR

DOUGLAS S. CHIN
LT. GOVERNOR



STATE OF HAWAII
PUBLIC UTILITIES COMMISSION
465 S. KING STREET, #103
HONOLULU, HAWAII 96813

RANDALL Y. IWASE
CHAIR

LORRAINE H. AKIBA
COMMISSIONER

JAMES P. GRIFFIN
COMMISSIONER

Telephone: (808) 586-2020
Facsimile: (808) 586-2056

website: puc.hawaii.gov
e-mail: Hawaii.PUC@hawaii.gov

May 4, 2018

FCC Headquarters
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Attn: Dana Wilson

Filed via ECFS

Reference: **CG Docket No. 03-123, TRS State Certification Application
Supplemental Documentation**

The Hawaii PUC provides the following supplemental documentation in response to Sherita Kennedy's May 1, 2018 email:

1. For rule requirement **64.604(a)(1)(v)**, the new requirement states that CAs handling STS calls must stay with the call for a minimum of 20 minutes, opposed to 15 minutes. The application states that you all are still complying to the 15 minute rule, but the matrix in the application states that you all are complying to the 20 minute rule. Can you please provide clarification that the state is in compliance to the 20 minutes rule for STS calls?

Hawaii PUC response:

Consistent with the new requirement of 64.604(a)(1)(v), Sprint CAs answering or placing a STS call stays with the call for a minimum of twenty minutes.

2. For rule requirement **64.604(c)(2)** your application, lists the following names:

Lisa Tom, Customer Relations Manager

Contract Administrator Name Delmond J. H. Won, Executive Officer

However, FCC's webpages for TRS points of contact for complaints lists:

Contact for TRS Complaints:

Brooke Kane
Public Utilities Commission, State of Hawaii

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This information can be found on:

<https://www.fcc.gov/general/hawaii-trs>

<https://www.fcc.gov/general/trs-points-contact-complaints>

Hawaii PUC response:

Please update FCC records and website information to reflect current Hawaii PUC contact information as:

Delmond J. H. Won, Executive Officer
Public Utilities Commission, State of Hawaii
465 South King Street, #103
Honolulu, Hawaii 96813

Telephone number: (808)586-2020; Fax number: (808)586-2066

E-mail: Hawaii.PUC@hawaii.gov

TRS Provider: Sprint

3. For rule requirement **64.606(d)**, the state funding mechanism, if labeled, must be labeled in a way to "promote national understanding of TRS" and that it does not offend the public." I don't see this requirement addressed in the application. Can you please certify to the compliance that the funding mechanism, if labeled, is labeled in a way to promote national understanding of TRS and that it does not offend the public.

Hawaii PUC response:

Communications promoting understanding of Relay Hawaii, such as the surcharge on local telephone bills, are labeled in a manner that is respectful and does not offend the public. As such, Relay Hawaii, is in compliance with this requirement.

4. **64.606(b)(1)(i)** requires that state TRS programs establish that they meet or exceed all operational, technical, and functional minimum standards contained in 64.604, and 64.604(d) incorporates by reference the CPNI rules, the states are required to establish that their programs comply with the CPNI rules.

Section 64.5109 states "*TRS providers shall have an officer, as an agent of the TRS provider, sign and file with the Commission a compliance certification on an annual basis*". We have received the compliance certification from Sprint every year, but we

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also need a compliance certification from the state certifying that the state is complying to all the requirements of the CPNI rules that are now TRS mandatory minimum standards.

Hawaii PUC response:

The Hawaii PUC has contracted with Sprint to be its TRS provider for the State of Hawaii. In response to its Request for Services, Sprint included, as part of its proposal, and has since confirmed that it complies with the FCC's CPNI minimum standards. By and through its contractor, the Hawaii PUC certifies that the state TRS programs comply with the CPNI rules.

We hope that this supplemental documentation addresses the compliance issues identified in your request. If there are any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Delmond J.H. Won", with a long horizontal line extending to the right.

Delmond J.H. Won
Executive Officer

DJHW:MM:JM